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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Anayeli Regalado, as Special Administrator of
the Estate of Eric Vukmir, deceased, and on
behalf of M.V., a minor, as her legal guardian,

Plaintiff,

v.

Gosselin Express Ltee, and Michel Gilbert,

Defendants.

Case No. 22 cv 4551

(Removed from the Circuit Court of the
Twelfth Judicial District, Will County, Illinois
Case No. 2022 LA 533)

NOTICE OF REMOVAL

Defendants, Gosselin Express Ltee and Michel Gilbert (“Defendants”), by and through counsel of record, Geoffrey A. Belzer of Wilson Elser Moskowitz Edelman & Dicker LLP, appear to remove this action, and submits this notice of removal in accordance with 28 U.S.C. § 1446. In support of removal, Defendants state as follows:

1. Plaintiff filed her complaint at law in the Circuit Court of the Twelfth Judicial District, Will County, Illinois, commencing the action *Anayeli Regalado, as Special Administrator of the Estate of Eric Vukmir, deceased, and on behalf of M.V., a minor, as her legal guardian, v. Gosselin Express Ltee, and Michel Gilbert* (Case No. 2022 LA 533). A copy of the complaint at law is attached hereto as Exhibit 1.

2. Plaintiff alleges in her complaint at law that Plaintiff’s decedent, Eric Vukmir, was a resident of Will County. (*See* Exhibit 1, ¶ 1). Will County is located in the State of Illinois.

3. Plaintiff alleges in her complaint at law that Defendant Gosselin Express, Ltee was a Canadian corporation. (*See* Exhibit 1, ¶ 2).

4. Plaintiff alleges in her complaint at law that Defendant Michel Gilbert was a Canadian resident. (*See* Exhibit 1, ¶ 3).

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5. Plaintiff's decedent was a citizen of the State of Illinois, and the Defendants are a citizen and corporation located in Canada, thereby creating complete diversity of citizenship based on 28 U.S.C. § 1332(a).

6. Plaintiff's complaint at law alleges that, as a result of one or more negligent acts of Defendants, a motor vehicle collision involving Mr. Vukmir resulted in his personal injuries and death. (*See* Exhibit 1, ¶ 9, 10).

7. Plaintiff's complaint at law does not allege a specific amount of damages nor does it place Defendants on notice of the amount demanded, except to state that the amount sought in judgment is in excess of the jurisdictional limits of this Court. (*See* Exhibit 1).

8. Counsel for Plaintiff asserted that the value of the claim was greater than \$5 million Canadian. (Exhibit 2, Affidavit of Geoffrey A. Belzer).

9. There can be no dispute the amount in controversy exceeds \$75,000 pursuant to 28 U.S.C. § 1332(a). (*See* Exhibit 2).

10. Defendants has waived service and advised Plaintiff of the same on August 25, 2022. As such, this notice of removal is timely under 28 U.S.C. § 1446(b)(2)(B).

11. A copy of this notice has been sent to the Circuit Court of the Twelfth Judicial District, Will County, Illinois.

12. Based on the above, all the requirements for removal of the state court action to this court pursuant to 28 U.S.C. § 1446 have been met.

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WHEREFORE Defendants, Gosselin Express Ltee and Michel Gilbert, remove this action from the Circuit Court of the Twelfth Judicial District, Will County, Illinois to the United States District Court for the Northern District of Illinois, Eastern Division.

Dated: August 26, 2022

Respectfully submitted,

By: /s/ Geoffrey A. Belzer

Geoffrey A. Belzer (#6292223)
Michael C. Habic (#6326996)
Wilson Elser Moskowitz Edelman & Dicker LLP
55 West Monroe Street, Suite 3800
Chicago, Illinois 60603
(312) 821.6116
geoffrey.belzer@wilsonelser.com
michael.habic@wilsonelser.com
*Attorneys for Defendants Gosselin Express Ltee
and Michel Gilbert*

CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2022 the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system and that a true and correct copy was served on all counsel of record by CM/ECF Electronic Notification, including the following:

Christopher M. Norem
Dennis M. Lynch
Attorneys for Plaintiff
Parente & Norem, P.C.
221 N. LaSalle St., Ste. 1750
Chicago, IL 60601
DL@pninjurylaw.com

By: /s/ Geoffrey A. Belzer